



U.S. Department of Justice

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Via ECF

MEMO ENDORSED

Honorable Lewis A. Kaplan
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *United States of America v. Deutsche Bank, A.G.*, 14 Civ. 9669 (LAK)

Dear Judge Kaplan:

The Government writes respectfully on behalf of the parties in the above-referenced action to submit a joint request for a three-week extension of the pending September 26, 2015 deadline for completion of fact discovery other than depositions and requests for admission. *See* Revised Scheduling Order (Dkt. No. 50). Defendants Deutsche Bank, A.G., DB U.S. Financial Markets Holding Corp., and Deutsche Bank Securities, Inc. (collectively, “Deutsche Bank” and collectively with the Government, the “parties”) join in this request. This is the parties’ second request to extend a discovery deadline. The parties are submitting a proposed joint stipulation to the Orders and Judgments Clerk for the Court’s consideration, and we enclose a copy with this letter.

Under the current Scheduling Order, “all fact discovery other than depositions and requests for admission shall be completed” by September 26, 2015, with fact discovery closing on January 29, 2015. *See* Dkt. No. 50. The parties have been proceeding diligently and cooperatively in discovery and anticipate being able to substantially but not fully complete fact discovery other than depositions and requests for admission by the current September 26 deadline. However, the parties request three additional weeks to complete all fact discovery other than depositions and requests for admission in order to allow additional time for, among other things, completion of redaction of privileged documents and completion of certain aspects of document review and production. Accordingly, the parties respectfully request that the Court order that the parties substantially complete by September 26 and fully complete by October 16 all fact discovery other than depositions and requests for admission. This partial extension would not impact any of the other current deadlines under the Court’s scheduling order, including the January 29, 2015 deadline for the close of fact discovery.¹

¹ The only motion pending before the Court is Deutsche Bank’s Motion to Dismiss the Complaint. *See* Dkt. No. 23 and related filings.

Memorandum Endorsement

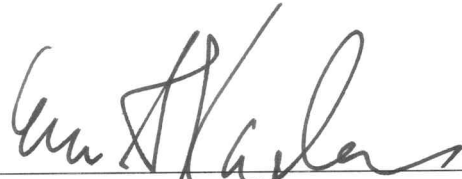
United States v. Deutsche Bank AG, 14-cv-9669 (LAK)

The government's letter motion on behalf of all parties for an extension of time [DI 52] is granted.

This application should not have been made by motion, letter or otherwise. The attention of counsel is invited to the Court's Electronic Case Filing Rules & Instructions §§ 18.1, 18.3.

SO ORDERED.

Dated: September 21, 2015

A handwritten signature in black ink, appearing to read "Lewis A. Kaplan", is written over a horizontal line.

Lewis A. Kaplan
United States District Judge